

COVID-19 Vaccination Policy

Organisation	Loxton Lutheran School
Policy Title:	COVID-19 Vaccination Policy
Date of Implementation:	14 th June 2022
Next Review Date:	Term 4 2022 or earlier if there is a significant change in circumstances

BACKGROUND

The Health and Safety of members of our learning community is paramount. The learning community is committed to ensuring, so far as is reasonably practicable, the health and safety of staff members, volunteers and students, while they are at our learning community.

The Work Health and Safety Act 2012 (SA) includes an obligation on our learning community to eliminate risks to health and safety, so far as is reasonably practicable and, if it is not reasonably practicable to eliminate risks to health and safety, to minimise those risks so far as is reasonably practicable.

COVID-19 continues to have a significant adverse impact on the South Australian community, including our learning community. The current public health advice is that vaccination against COVID-19 provides a reduction of serious disease, hospitalisation, and death in individuals, and can also significantly reduce the chance of acquiring the infection and passing it on to other people.

The learning community is very concerned about the potential health implications of the spread of COVID -19 within the learning community, especially for those who are more vulnerable.

The absences of staff members and students because they have COVID-19 lessens the ability of our learning community to provide an optimal learning and caring environment for students.

COVID-19 has been assessed to be an extreme and high risk in our learning community.

Until 31 March 2022, staff members, contractors and volunteers at our learning community were required to comply with a legal Direction from the State Co-ordinator on COVID-19 vaccinations. The Direction has been lifted and our learning community now has the responsibility for determining any vaccination requirements.

The risk of COVID-19 infections being acquired and passed on to others spreading within our learning community is significantly reduced if members of our learning community are vaccinated.

This policy contains the vaccination requirements to apply in our learning community.

VACCINATION REQUIREMENTS

New staff members

All new staff members, including permanent, fixed term and casual staff (including Temporary Relief Teachers), will be required to provide evidence that they have had at least two TGA approved COVID-19 vaccinations as a condition of their employment. The learning community will strongly recommend that all new staff members have three TGA approved COVID -19 vaccinations.

Current staff members

All staff members, including permanent, fixed term and casual staff (including Temporary Relief Teachers), are required to have at least two TGA approved COVID-19 vaccinations. The learning community strongly recommends that all staff members have three TGA approved COVID-19 vaccinations.

If a staff member has had two TGA approved COVID-19 vaccinations only, they must:

- Undertake a Rapid Antigen Test each day before attending the learning community; and
- Wear a surgical mask at all times while indoors at the learning community.

The learning community will provide the Rapid Antigen Tests and the surgical masks. The learning community may require the staff member to provide reasonable evidence that they have undertaken a Rapid Antigen Test.

These additional risk treatments do not apply to a staff member during the four months after they have had COVID-19 or who are not yet due for their third dose under ATAGI guidelines.

In exceptional circumstances, and on a case by case basis, the Principal may grant an exemption to the vaccination requirements, where either it is not possible for the staff member to be vaccinated because the staff member has a recognised Medical Contraindication to Vaccination, consistent with ATAGI guidelines, as varied from time to time, or for other exceptional medical circumstances. If a person receives a temporary medical exemption, they must reapply for an exemption or comply with the vaccination requirements in this policy once the exemption expires.

The approved medical exemption document is to be provided to the Principal. If the approved medical exemption document is not provided to the Principal, the learning community will assume that no such medical exemption exists.

If a staff member has been granted an exemption they must:

- Undertake a Rapid Antigen Test each day before attending the learning community;
- Wear a surgical mask at all times while indoors at the learning community; and
- Wear a surgical mask at all times when undertaking responsibilities on behalf of the learning community away from the learning community's premises, when they are indoors with staff or students or in a vehicle (other than with their own children).

The learning community will provide the Rapid Antigen Tests and the surgical masks. The learning community may require the staff member to provide reasonable evidence that they have undertaken a Rapid Antigen Test.

Staff members who have not had three doses of a TGA approved COVID-19 vaccination will not work 1:1 with any student with a medical vulnerability to COVID-19.

Current staff members who are on leave are not required to meet the vaccination requirements until they return to work at the learning community.

If a staff member is unable or unwilling to comply with the additional risk treatments for those who have not received at least three doses of a TGA approved COVID-19 vaccination, they will not be able to access the learning community's premises without the permission of the Principal.

Volunteers

All volunteers who spend other than incidental time indoors with staff and students (other than their own children) at our learning community will be required to have at least two TGA approved COVID-19 vaccinations. The learning community strongly recommends that these volunteers have three TGA approved COVID-19 vaccinations.

If a volunteer has had two TGA approved COVID-19 vaccinations only, they must:

- Undertake a Rapid Antigen Test each day before attending the learning community; and
- When volunteering, wear a surgical mask at all times while indoors or in a vehicle with staff or students (other than their own children).

In exceptional circumstances, the Principal may grant an exemption to volunteers. In exceptional circumstances, the Chair of the Board of the learning community may grant an exemption to a Board member. If a volunteer or Board member has been granted an exemption they must, when volunteering or attending a Board meeting:

- Undertake a Rapid Antigen Test before attending the learning community; and
- When volunteering or attending a Board meeting, wear a surgical mask at all times while indoors or in a vehicle with staff or students (other than their own children).

If a volunteer is required to undertake a Rapid Antigen Test, the learning community may require the volunteer to provide reasonable evidence that they have undertaken the test.

Contractors and employees of contractors

Contractors and employees of contractors who spend other than incidental time indoors with staff and students (other than their own children) at our learning community will be required to have at least two TGA approved COVID-19 vaccinations. The learning community strongly recommends that they have three TGA approved COVID-19 vaccinations.

There may be some circumstances where it may not be feasible for our learning community to enforce this requirement, including because of contractual arrangements already established or urgent circumstances. Where that is the case, the contractors and employees of contractors will be expected to wear a mask at all times while indoors and, if feasible, undertake a Rapid Antigen Test each day before attending our learning community.

Parents and visitors

It is preferable that all visitors to our learning community are vaccinated. However, they are not required to be vaccinated because of the limited amount of time that they spend at our learning community and the disruption such a requirement would cause.

Students

Although the risk of COVID-19 spreading would be reduced if all students were vaccinated, it is not feasible to require students to be vaccinated.

PROOF OF VACCINATION

Prospective and existing staff members, volunteers and contractors will receive a formal request by our learning community to view a copy of their Vaccination Certificate to confirm that they have complied with the requirement to be vaccinated.

By producing proof of vaccination against COVID-19 for inspection, a person demonstrates their consent to the collection, retention and disclosure of either their Vaccination Certificate (if a copy is provided), or otherwise the fact of their vaccination status (where a copy of their Vaccination Certificate is only sighted and not retained), to the learning community for the purpose of the learning community confirming whether or not they have been vaccinated against COVID-19. In those circumstances, by providing proof of vaccination, the person demonstrates their consent to the learning community sharing their vaccination *status* with third parties as contemplated under this Policy.

If a person does not provide or show the learning community their Vaccination Certificate, and provides no reasonable explanation, the learning community will assume that the person has not been at least double vaccinated against COVID-19.

Why is it necessary to collect this information?

It is reasonably necessary for the learning community to collect, retain and (where applicable) disclose the confirmation of vaccination status of staff members, volunteers and contractors for the following reasons:

- for the purposes of complying with requests for confirmation of a person's vaccination status from third parties such as government bodies, and suppliers. Where required, the learning community will provide confirmation of the vaccination status of relevant persons to the third party;
- to prevent and manage the potential spread of COVID-19 within the learning community (including in planning and risk management, as well in managing resourcing in the event of an outbreak within the learning community);
- to assist the learning community in complying with its obligations under work health and safety laws;
- to assess and reduce the risk to members of the learning community, noting that staff members, contractors and volunteers work in close proximity to one another, and with students, in a number of settings;
- to enable the learning community to maintain continuity and to manage the threat which COVID-19 poses to that continuity; and
- to limit risk of transmission and significant adverse health outcomes, noting the size of the learning community's workforce.

How will the learning community use or disclose COVID-19 vaccination information?

If you produce or show your Vaccination Certificate to the learning community, only your vaccination *status* may be used or disclosed by learning community as follows:

- for the purpose of verifying a person's vaccination status in relation to accessing the premises;
- to ensure the learning community complies with laws, directions or requests from government authorities (for example, if the Department of Health requests a list of those who are vaccinated against COVID-19,

or otherwise proof that the learning community has confirmed the vaccination status of its employees, volunteers and contractors);

- to confirm whether a person has complied with a requirement under this policy to be vaccinated against COVID-19;
- where necessary, to satisfy suppliers and partners of the learning community of a person's vaccination status; and
- any other purpose which is reasonably related to managing the risks of COVID-19 in the learning community.

Access to COVID-19 vaccination information

If at any time a non-staff member of our learning community (e.g. a contractor) requests their COVID-19 vaccination status information, as collected by the learning community and/or wishes to amend or correct the information, please contact the Principal.

How to lodge a privacy complaint

If a person believes that the learning community has breached its obligations in relation to their COVID-19 vaccination status information under the *Privacy Act 1988* they may lodge a complaint in accordance with its Privacy Policy.

CONSEQUENCES OF NON-COMPLIANCE

Appropriate action will be taken against a person who is found to have breached this policy. These measures will depend on the nature and circumstance of each breach and for staff members could include:

- agreement to take a period of leave,
- a verbal or written warning,
- disciplinary action up to and including dismissal of the person engaging in behaviour in breach of this policy.

REVIEW

This policy will be reviewed in Term 4 of 2022, or earlier if there is a significant change in circumstances.

DEFINITIONS

- **ATAGI** means Australian Technical Advisory Group on Immunisation.
- **Medical Contraindication to Vaccination** means where a person has been assessed by an authorised medical practitioner as being permanently or temporarily clinically unable to receive any currently TGA approved or recognised COVID-19 vaccination. This will be because either the person has a permanent or temporary Medical Contraindication to Vaccination, being one of the contraindications outlined in formal clinical advice from the Australian Department of Health to vaccine providers based on advice from the TGA and ATAGI.
- **TGA** means the Therapeutic Goods Administration.
- **Vaccination Certificate** means an original and authentic COVID-19 digital certificate, or, if the Employee is unable to access a COVID-19 digital certificate, the Employee's Australian Immunisation History Statement. A person is encouraged to redact evidence of vaccinations other than their vaccinations against COVID-19 if they produce a copy of their Australian Immunisation History Statement for inspection.

Adopted by LLS School Council on: 14/ 07 /2022

To be reviewed: Term 4 2022